

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ASSOCIATION OF CLUB EXECUTIVES
OF DALLAS, INC., et al.,

Plaintiffs,

v.

CITY OF DALLAS, TEXAS,

Defendant.

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Civil Action No. 3:22-cv-00177-M

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Defendant City of Dallas, Texas respectfully moves the Court for an order pursuant to Fed. R. Civ. P. 56 granting the City summary judgment on all claims asserted in the Plaintiffs' Second Amended Complaint (ECF No. 90).

This motion incorporates, and is supported by, an accompanying brief and appendix. Pursuant to LR 56.3, the matters required by subsection (a) of that rule are set forth in the City's brief in support of summary judgment.

Dated: February 4, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on February 4, 2025, I filed the foregoing document with the United States District Court for the Northern District of Texas via the Court's CM/ECF system, thereby serving all parties of record by operation of the CM/ECF system.

/s/Scott D. Bergthold

Scott D. Bergthold